Telecom Tax Services Sales Tax Services Tax Rating Services Regulatory Services

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February 6, 2013 Via US ECFS

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street S.W. Washington, D.C. 20554

RE:

D.D.D. Calling, Inc.

Form 499 Filer ID: 811333

Annual Customer Proprietary Network Information Compliance Certification;

EB Docket No. 06-36

Dear Ms. Dortch,

Enclosed for filing is the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification; EB Docket No. 06-36, filed on behalf of D.D.D. Calling, Inc..

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Please do not hesitate to contact me at 407-260-1011 or <a href="mark@csilongwood.com">mark@csilongwood.com</a> if you have any questions or concerns.

Thank you for your assistance in processing this filing.

Sincerely,

Mark G. Lammert, CP

Tax Preparer for D.D.D. Calling, Inc.

cc:

D.D.D. Calling, Inc.

file:

D.D.D. Calling, Inc.-PUC - FCC

"Final Return"

## STATEMENT OF POLICY IN TREATMENT OF CUSTOMER PROPRIETARY NETWORK INFORMATION

- It is D.D.D. Calling, Inc. (hereafter referred to as "D.D.D. Calling") policy not to use CPNI for any activity other than permitted by law. Any disclosure of CPNI to other parties (such as affiliates, vendors, and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by the company to the customer. If the Company is not required by law to disclose the CPNI or if the intended use does not fall within one of the carve outs, the Company will first obtain the customer's consent prior to using CPNI.
- 2. D.D.D. Calling follows industry-standard practices to prevent unauthorized access to CPNI by a person other that the subscriber or D.D.D. Calling. However, D.D.D. Calling cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. Therefore:
  - A. If an unauthorized disclosure were to occur, D.D.D. Calling shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").
  - B. D.D.D. Calling shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.
  - C. Notwithstanding the provisions in subparagraph B above, D.D.D. Calling shall not wait the additional seven (7) days to notify its customers if D.D.D. Calling determines there is an immediate risk of irreparable harm to the customers.
  - D.D.D. Calling shall maintain records of discovered breaches for a period of at least two (2) years.
- All employees will be trained as to when they are, and are not, authorized to use CPNI
  upon employment with the Company and annually thereafter.
  - A. Specifically, D.D.D. Calling shall prohibit its personnel from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances:
    - When the customer has pre-established a password.
    - When the information requested by the customer is to be sent to the customer's address of record, or
    - When D.D.D. Calling calls the customer's telephone number of record and discusses the information with the party initially identified by customer when service was initiated.